

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

In re CITY OF CENTRAL FALLS, RHODE ISLAND Debtor) Case No. 11-13105)	Chapter 9
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**CITY OF CENTRAL FALLS' MOTION FOR AN ORDER
APPROVING AMENDED DISCLOSURE STATEMENT WITH
RESPECT TO THE AMENDED PLAN FOR THE ADJUSTMENT
OF DEBTS OF CITY OF CENTRAL FALLS, RHODE ISLAND,
DATED JUNE 15, 2012, AND SETTING CONFIRMATION
PROCEDURES**

The City of Central Falls, Rhode Island (the "City"), the debtor in the above-captioned case, by and through its state-appointed receiver, John F. McJennett III (the "Receiver"), hereby moves this Court for entry of an order approving the adequacy of the Amended Disclosure Statement with respect to the Amended Plan for the Adjustment of Debts of City of Central Falls, Rhode Island, dated June 15, 2012 ("Amended Disclosure Statement"), and setting certain confirmation deadlines. As grounds therefore, the City relies on its Memorandum in Support of Motion for Order Approving the Amended Disclosure Statement with Respect to the Amended Plan for the Adjustment of Debts of City of Central Falls, Rhode Island, dated June 15, 2012 (the "Amended Plan") filed simultaneously herewith.

RELIEF REQUESTED

This Motion seeks an order approving the Amended Disclosure Statement and setting a timeline and procedure for:

- (1) Form of Notices to Unimpaired Classes and Bondholders;
- (2) Form of Solicitation Packages and Notices to Impaired Classes;

- (2) Date by which all ballots must be sent to Impaired Classes;
- (3) Date upon which to file acceptances or rejections of the Amended Plan;
- (4) Date for filing objections to the Amended Plan; and
- (5) Date for the filing of a confirmation brief in support of the Amended Plan; and
- (6) Date for a hearing on whether the Amended Plan should be confirmed.

A proposed form of Order is attached hereto as ***Exhibit 1***.

The City submits that the Amended Disclosure Statement contains adequate information of a kind, and in sufficient detail, that would enable a typical holder of claims in a class impaired under the Amended Plan to make an informed judgment with respect to the Amended Plan.

The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157(b). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L). Venue in the District of Rhode Island is appropriate pursuant to 28 U.S.C. §§ 1408 and 1409.

This Motion is based on the Memorandum, the record in this case, and the evidence, arguments, and representations that may be presented at or prior to the hearing on the Motion.

WHEREFORE, the City respectfully requests that the Court enter an order: (i) approving the Amended Disclosure Statement as containing adequate information; (ii) setting deadlines relating to the confirmation process; (iii) setting a hearing on confirmation of the Amended Plan; and (iv) granting such other and further relief as the Court deems to be just and proper.

JOHN F. MCJENNITT, III, in his capacity as Receiver of Central Falls,

/s/ Theodore Orson

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Dated:

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2012, I filed the within document with the Clerk of the Bankruptcy Court for the District of Rhode Island and thereby provided electronic notice through the CM/ECF System to the following participants:

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I further hereby certify that I have this date served a copy of the above-referenced paper(s) on the following non CM/ECF participants by first class mail, postage prepaid, at the addresses noted below:

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/s/ Theodore Orson, Esq.